1	D. NEAL TOMLINSON, ESQ. (Nevada Bar No. 6851)		
2	WAYNE GROSS, ESQ. (Will Comply with LR IA 10-2 within 30 days)		
3	MICHAEL D. STEIN, ESQ. (Nevada Bar No. 4760) BRIAN R. REEVE (Nevada Bar No. 10197) SNELL & WILMER L.L.P.		
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6	, ,	1205)	
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10	Attorneys for Defendant Frias Management, LLC		
11	UNITED STATES DISTRICT COURT		
12	DISTRICT OF NEVADA		
13	THEODORE TRAPP, on his own behalf and on behalf of all others similarly situated.	CASE NO. 2:09-CV	
14	Plaintiff,	DEFENDANT FR	

CASE NO. 2:09-CV-00995-LDG-GWF

DEFENDANT FRIAS MANAGEMENT, LLC'S DEMAND FOR SECURITY OF COSTS

Plaintiff,
VS.
BIG POPPA'S, LLC, a Nevada limited liability company d/b/a BADDA BING MEN'S CLUB; SKY TOP VENDING, INC., a Nevada corporation d/b/a CAN CAN ROOM; LA FUENTE, INC., a Nevada corporation d/b/a CHEETAH'S; C.P. FOOD AND BEVERAGE, INC., a Nevada corporation d/b/a CLUB PARADISE; DÉJÀ VU SHOWGIRLS OF LAS VEGAS, LLC, a Nevada limited liability company d/b/a DÉJÀ VU SHOWGIRLS; PALOMINO CLUB, INC., a Nevada corporation d/b/a PALOMINO CLUB; SHAC, LLC, a Nevada corporation d/b/a SAPPHIRE; K-KEL, INC., a Nevada corporation d/b/a SPEARMINT RHINO; D.2801 WESTWOOD, INC., a Nevada corporation d/b/a TREASURES; LITTLE DARLINGS OF LAS VEGAS, LLC, a Nevada limited liability company d/b/a
LITTLE DARLINGS; O.G. ELIADES,
A.D., LLC, a Nevada limited liability company d/b/a OLYMPIC GARDENS;
LAS VEGAS ENTERTAINMENT, LLC, a

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1	Nevada limited liability company d/b/a
	LARRY FLYNT'S HÚSTLÉR ČLUB;
2	MICHAEL A. SALTMAN d/b/a MINXX;
	RICK'S LAS VEGAS; FRIAS
3	MANAGEMENT, LLC, a Nevada limited
	liability company d/b/a ACE CAB
4	COMPANY and A-NORTH LAS VEGAS
-	CAB; WESTERN CAB COMPANY, a
5	Nevada corporation d/b/a WESTERN CAB
	COMPANY and WESTERN LIMOUSINE;
6	NEVADA CHECKER CAB
_	CORPORATION, a Nevada corporation
7	d/b/a NEVADA CHECKER CAB
ا ۾	COMPANY; NEVADA STAR CAB
8	CORPORATION, a Nevada corporation
ام	d/b/a STAR CAB COMPANY; NEVADA
9	YELLOW CAB CORPORATION, a
10	Nevada corporation d/b/a YELLOW CAB COMPANY; LUCKY CAB COMPANY
10	OF NEVADA, a Nevada corporation d/b/a
11	LUCKY TRANS; SUN CAB, INC., a
**	Nevada corporation d/b/a NELLIS CAB
12	COMPANY; CLS NEVADA, LLC, a
	Nevada limited liability company d/b/a
13	CLS TRANSPORTATION LAS VEGAS;
·	ON DEMAND SEDAN SERVICES, LLC,
14	a Nevada limited liability company d/b/a
	ODS LIMOUSINES and ODS
15	CHAUFFEURED TRANSPORTATION;
	BLS LIMOUSINE SERVICE OF LAS
16	VEGAS INC.; DESERT CAB, INC., a
	Nevada corporation d/b/a DESERT CAB
17	COMPANY and ODYSSEY LIMOUSINE;
10	BELL TRANS A NEVADA
18	CORPORATION, a Nevada corporation
19	d/b/a BELL TRANS; TONY CHONG, an individual; and DOE EMPLOYEES 1-
17	1000;
20	1000,
٠-٠	Defendants.
	Doronauro.

THEODORE TRAPP, Plaintiff; and To:

To: JAY EDELSON, RAFEY BALABANIAN, and JAMES SMYTH his attorneys.

Pursuant to NRS 18.130, Frias Management, LLC hereby makes demand upon Plaintiff, who resides out of State, for security in the amount of Five Hundred and No/100 Dollars (\$500.00) for costs and charges which may be awarded herein against Plaintiff. The requirements of NRS 18.130 apply to actions in the United States District Court, District of Nevada. Truck Ins.

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Exchange, 683 F. Supp. 223, 227-28	(D. Nev. 1988); <u>Hamar v. Hyatt Corp.</u> , 98 F.R.D. 305, 305-
06 (D. Nev. 1983).	

DATED this /9 day of June, 2009.

By:

D. NESA TOMLINSON, ESQ.

WAYNE GROSS, ESQ.

MICHAEL D. STEIN, ESQ.

BRIAN R. REEVE, ESQ.

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Attorneys for Defendant Frias Management, LLC

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CERTIFICATE OF SERVICE

I certify that I am an employee of Snell & Wilmer, L.L.P., and that on the day of June, 2009, I electronically transmitted the **DEFENDANT FRIAS MANAGEMENT**, **LLC'S DEMAND FOR SECURITY OF COSTS** to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the counsel listed below, who have registered to receive Electronic Filing:

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Attorneys for/Plaintiff

An employee of Snell & Wilmer L.L.P